DIA - Electronic Document Management: Practical Learnings

Electronic Submissions @ FDA CDER

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ZAI/AMELEX

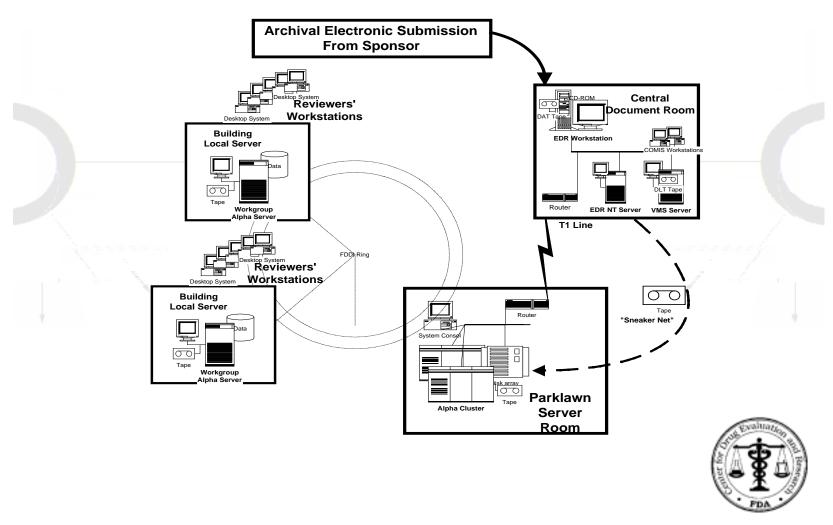
An Information & Engineering Technology Company

- Partners with FDA CDER for 8 Years
- Operate the CDER Document Rooms
- Designed, Implemented and Operate the Electronic Document Room in accordance with CDER's Guidance



Electronic Document Room

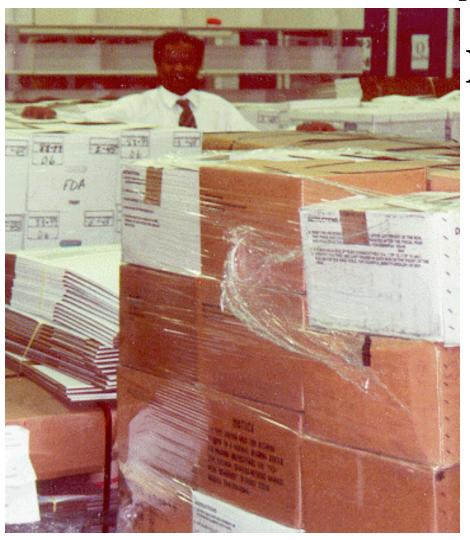
The CDER Electronic Document Room



First Goal -



Increase Speed & Quality



Desktop Delivery w/Integrated

- -Search & Access
- Presentation
- Navigation
- Analytical Tools
- Reporting

Second Goal -



Archival Electronic Submissions

Require Independence from -

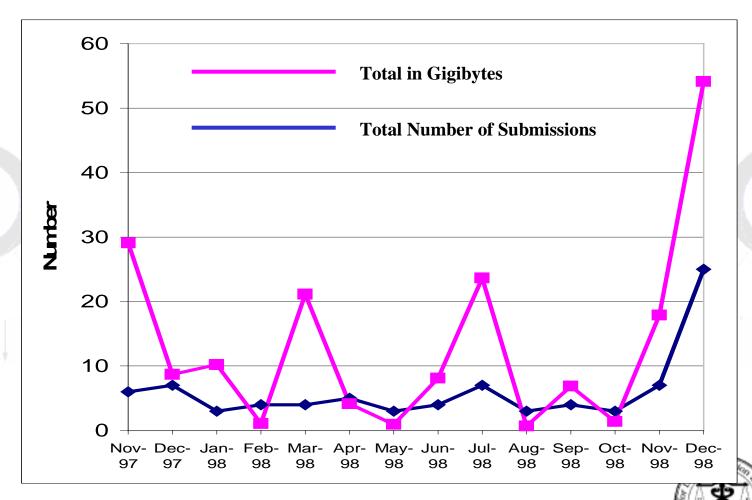
- Specific Computer Hardware
- Specific Operating System and Version
- Proprietary Application Software





CDER has Received to Date ...

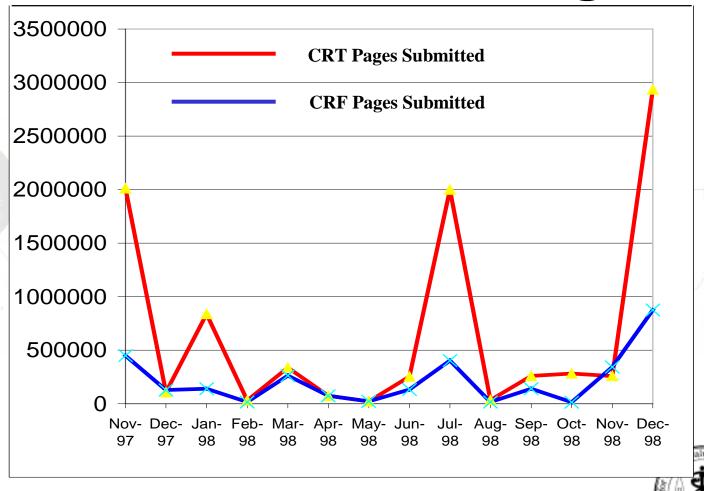
85 Electronic Submissions





Archived in lieu of Paper . . .

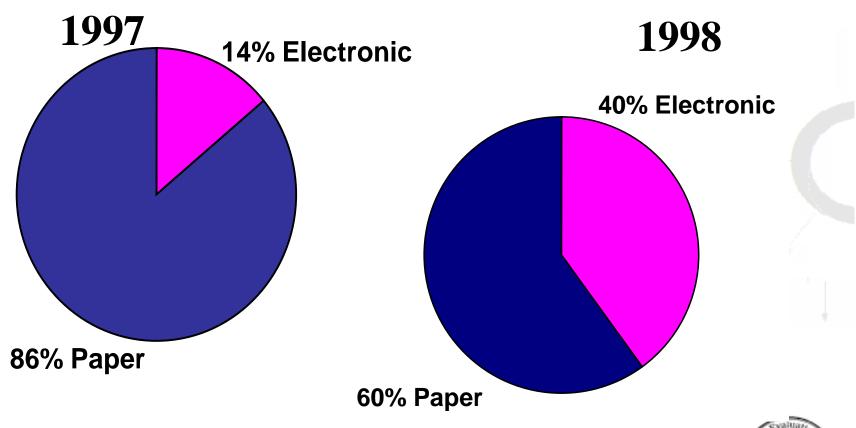
Over 10 Million Pages





NDA Archival Pages . . .

Paper Vs. Electronic -







EDR Technical Approach

- Metadata Stored in CDER's Oracle Database
- Document Key of Six Fields
- Electronic Submission Linked to Specific Paper Document
- Web Server Locator/Access Services Server-side Programming



Electronic The EDR -

Document Room

Physical Processing



- Locate Electronic Files & Separate from Paper
- Bind & Barcode <u>Transport</u> <u>Media</u> (Not Archival)
- Core MetaData Entered into Oracle Database





<u>The EDR</u> -

Cataloging Metadata

for Electronic Submissions

- Map the submission
 - Application >> Documents
 - Documents >> Item Subsections
 - Items >> Network Location
- Search by Application
 Number and Trade Name





Conformance Issues

The Conformance Checklist

- The Guidance Document Online as an Acrobat .pdf Form
- Submission Review Checkboxes and Comments on the Guidance Form
- Electronic Submissions Coordinator Can Provide Feedback to Sponsors





Network Mounting

CDER Personnel Can Control -

- Building and Network Location
- Reviewer Access, and can
- Monitor E-sub Usage by CDER Username





Data Integrity Issues

The EDR Staff Perform -

- Directory and File Checks
- Binary Comparisons
- Online Presentation and Document Printout Checks

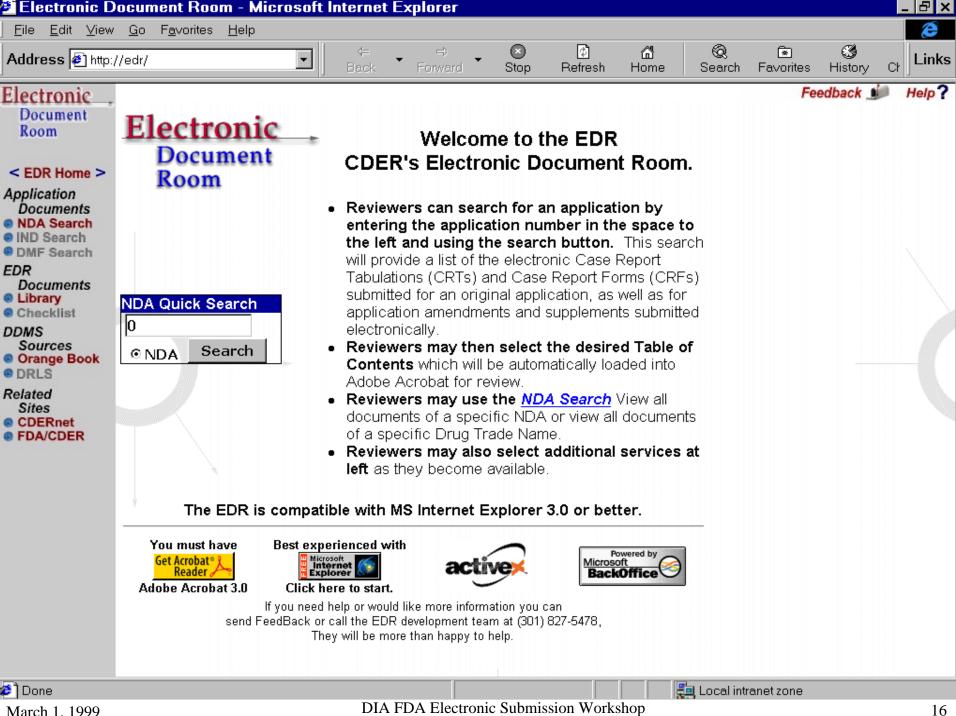


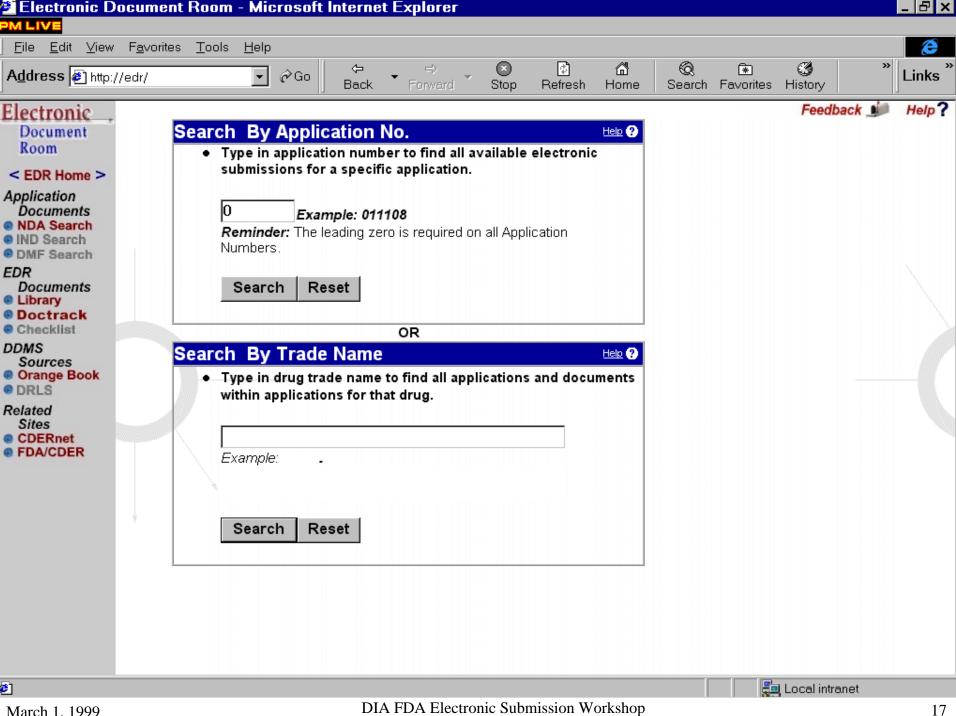


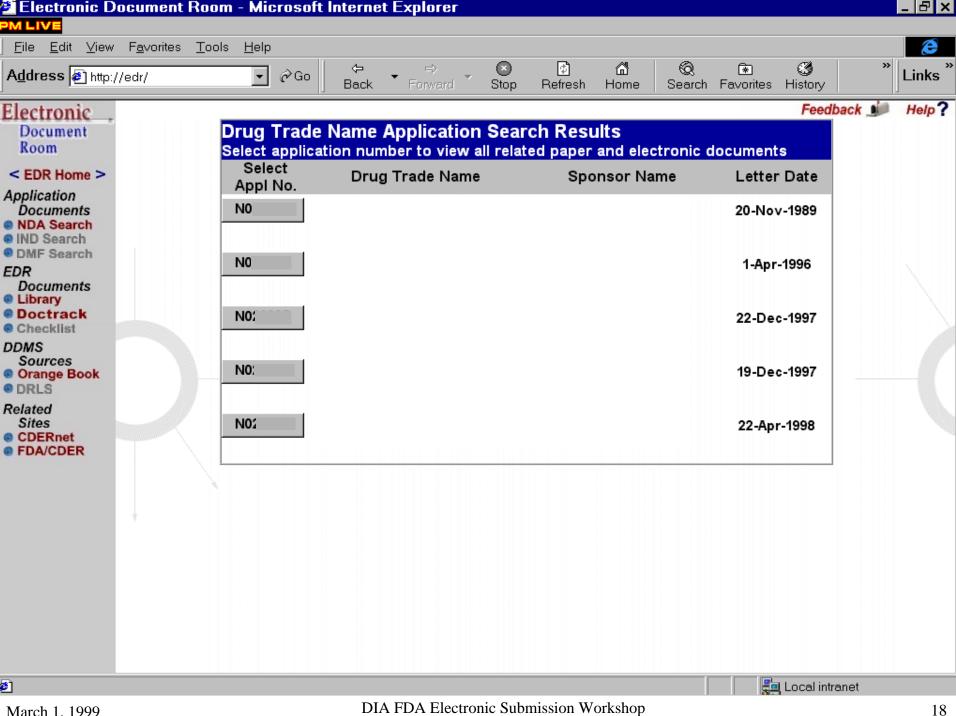
Archival Tape Creation

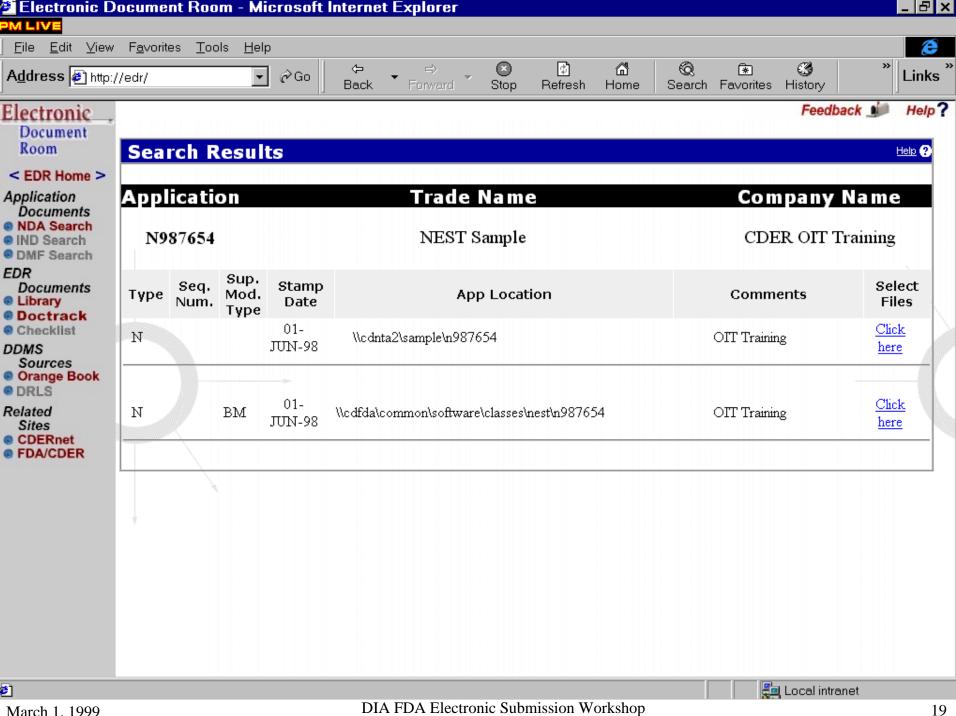
- Formats Archived Include
 - Adobe Acrobat (.pdf)
 - SAS Transport (.xpt)
- Currently NT Backup on 20/40
 DLT Tapes
- Two Copies Barcoded and Stored

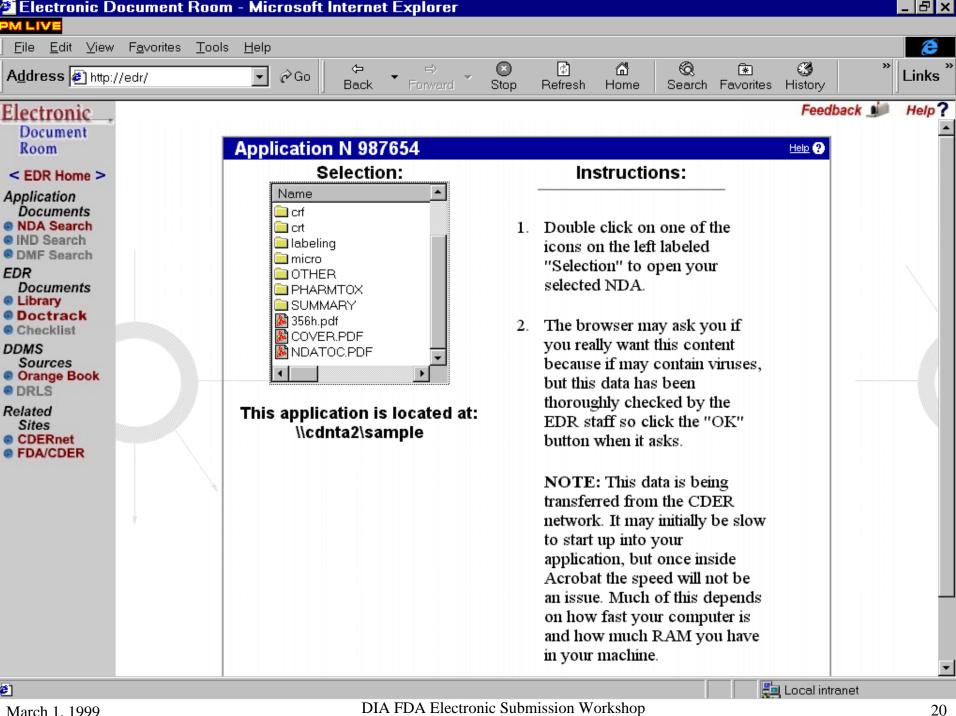


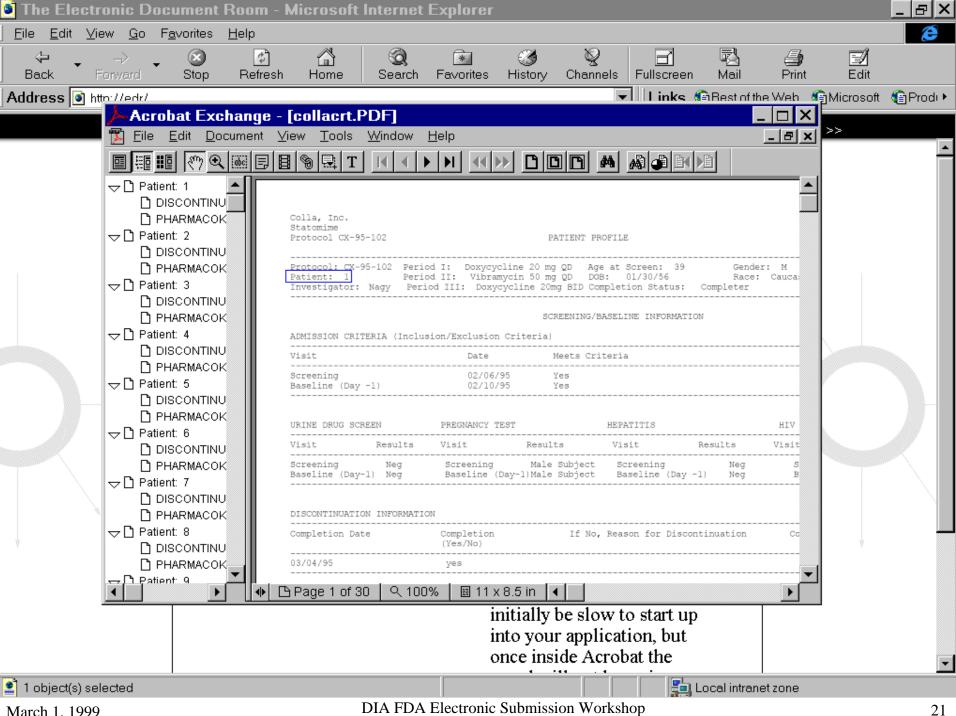


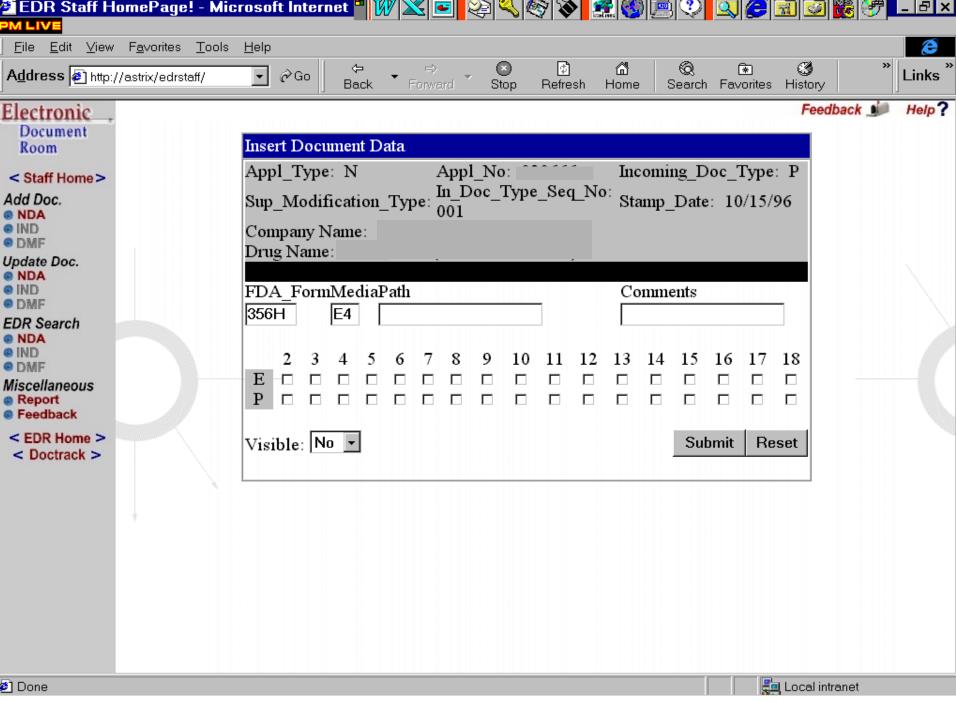




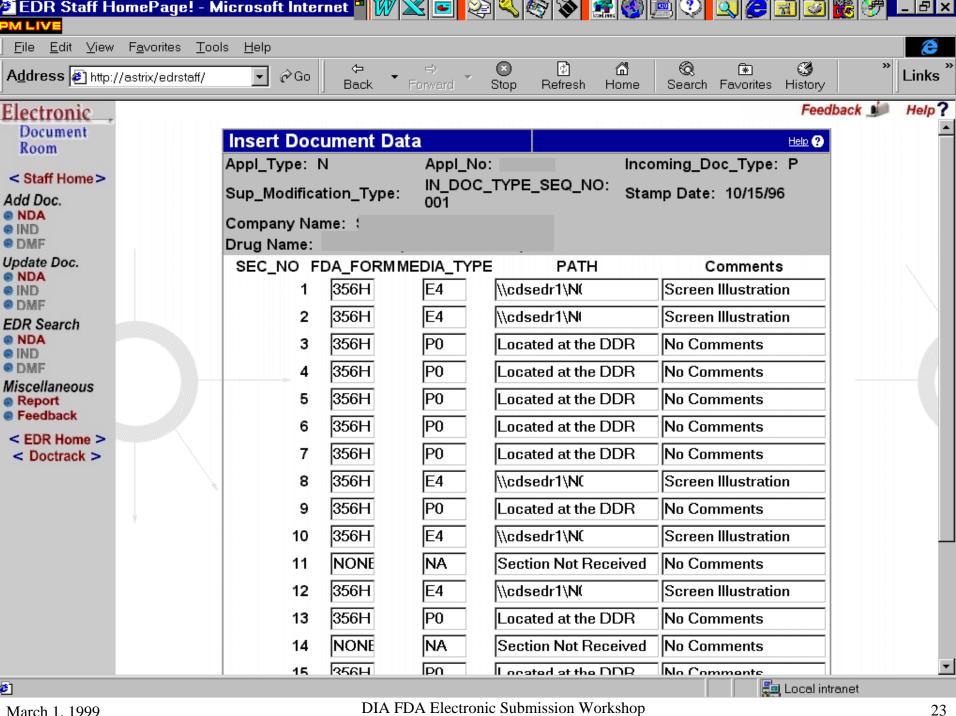


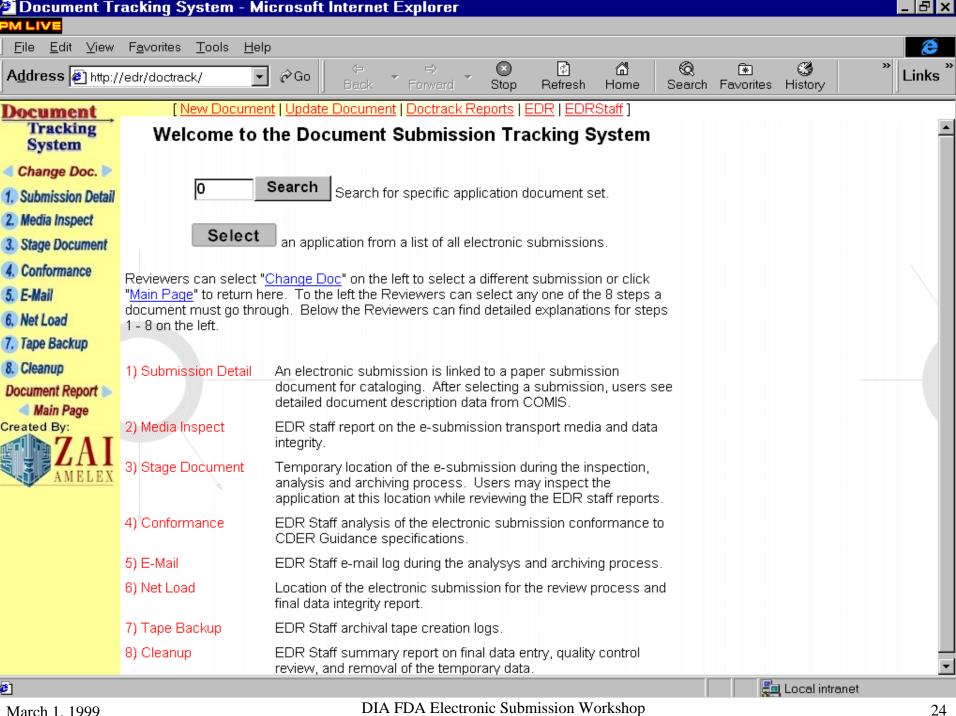


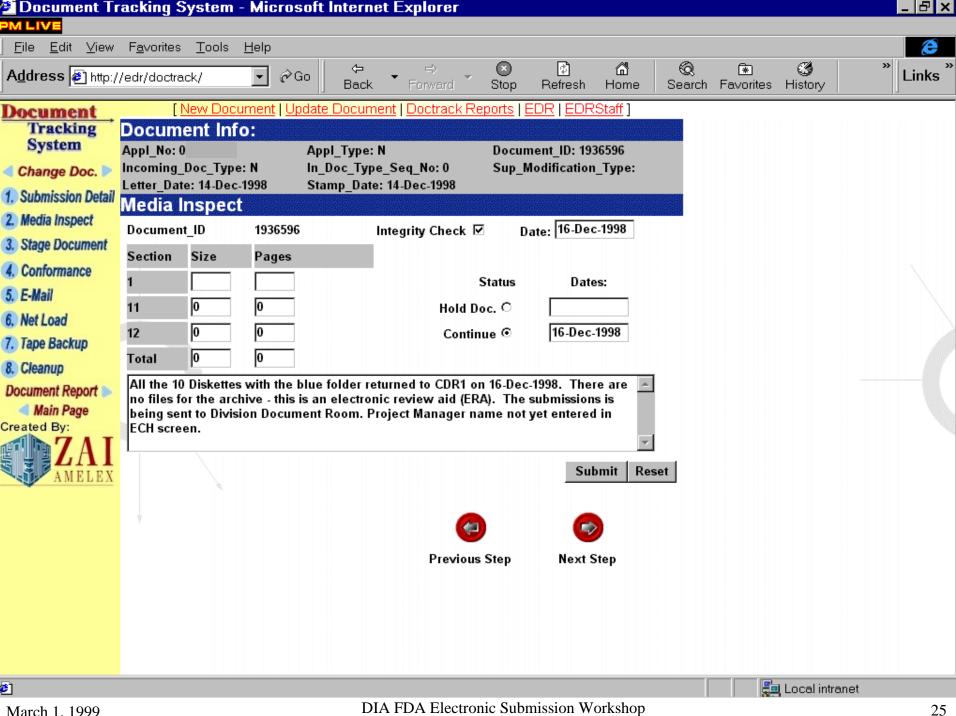


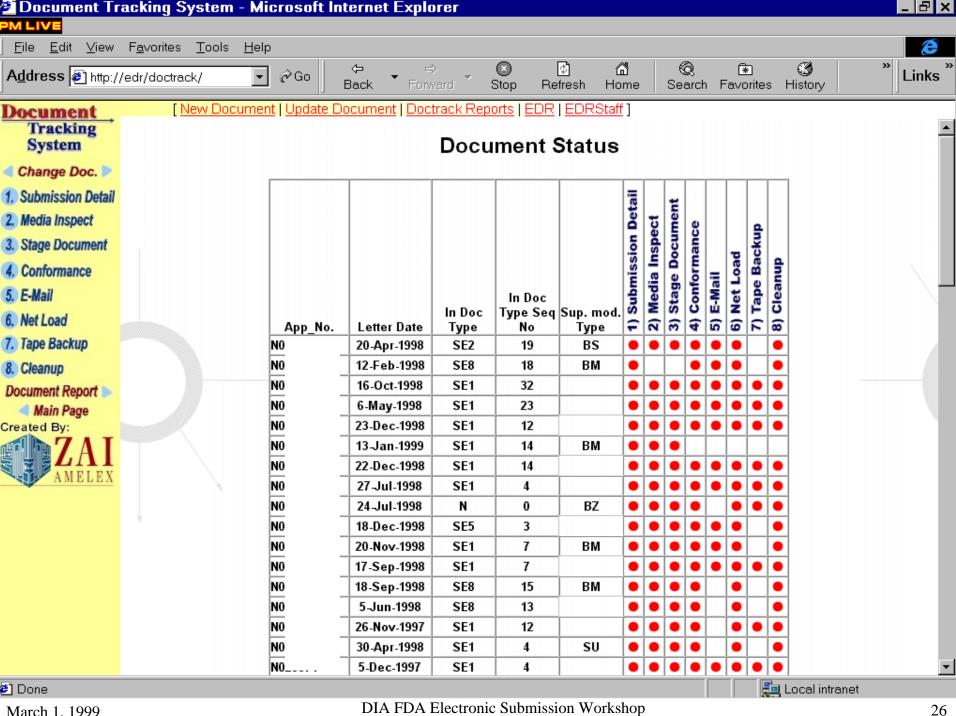


March 1 1999











Proprietary Information Security

- CDER Network Highly Secure,
 Double Firewall Intranet
- Physical Media for Data
 Transport and Submission
- Confidential Management of Proprietary Information





Issue -

"Electronic Review Aids"

1. Electronic Archival Files

Designed to <u>Replace</u> paper Submitted with Archival Copy

2. Review Aids

Designed to <u>Assist</u> Reviewers

Submitted with <u>Review</u> Copies

Prefer to Minimize Electronic Review Aids



Electronic Records Management



Initial Lessons Learned

• Complex Document-based Records <u>are very different from</u>

Transactional Data-based Records

To Combine Both Documents and Data -

CDER's Hypertext Links between Acrobat Documents and SAS Datasets is One Workable Approach



Electronic Records Management



Initial Lessons Learned Manage the Details

In CDER's Example -

- Follow the Guidance Closely !!!!
- Work with CDER's Electronic Submission Coordinator
- Send Archival E-subs Directly to *The Central Document Room*





The Future of Electronic Submissions

New Document Types

at CDER

- INDs, ANDAs, DMFs ...
- Await Experience with these Current First Steps





The Future -

Digital Signatures

Electronic Signatures in Lieu of Paper

- Docket 92s-0251
 - Any Electronic Signature System That
 Complies With the Provisions of Part 11
- Await a Robust Public Key Infrastructure

